

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Wikimedia Foundation, et al.,

Plaintiff(s)

v.

National Security Agency, et al.,

Defendant(s)

Case No.: 1:15-cv-00662-TSE

MOTION FOR ADMISSION *PRO HAC VICE*

I, Jan I. Berlage, am a member in good standing of the bar of this Court.

My bar number is 23937 I am moving the admission of Andrew Crocker
to appear *pro hac vice* in this case as
counsel for Amici Curiae.

We certify that:

1. The proposed admittee is not a member of the Maryland bar and does not maintain any law office in Maryland
2. The proposed admittee is a member in good standing of the bars of the following State Courts and/or United States Courts:

State Court & Date of Admission

Supreme Court of California 12/3/2013

U.S. Court & Date of Admission

USDC ND CA 12/9/2013

USDC CD CA 4/8/2015

Ninth Circuit 12/23/2013

3. During the twelve months immediately preceding this motion, the proposed admittee has been admitted *pro hac vice* in this Court no times.
4. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction. (NOTE: If the proposed admittee has been disbarred, suspended, or denied admission to practice law in any jurisdiction, then he/she must submit a statement fully explaining all relevant facts.)

5. The proposed admittee is familiar with the Maryland Lawyers' Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court, and understands he/she shall be subject to the disciplinary jurisdiction of this Court.

6. The proposed admittee understands admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

7. Either the undersigned movant or _____, is also a member of the bar of this Court in good standing, and will serve as co-counsel in these proceedings.

8. **The \$50.00 fee for admission *pro hac vice* accompanies this motion.**

9. We hereby certify under penalties of perjury that the foregoing statements are true and correct.

Respectfully submitted,

MOVANT

s/ Jan I. Berlage

Signature

Jan I. Berlage

Printed Name

Gohn Hankey Stichel & Berlage LLP

Firm

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PROPOSED ADMITTEE

s/ Andrew Crocker

Signature

Andrew Crocker

Printed Name

Electronic Frontier Foundation

Firm

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(Signed by Andrew Crocker

with permission of Jan Berlage)

Motion for Admission *Pro Hac Vice* of Andrew Crocker
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List of *Amici Curiae* Represented:

The American Booksellers Association
American Library Association
Association of Research Libraries
Freedom to Read Foundation
International Federation of Library Associations and Institutions